



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

SEP 06 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Bell
President
Collis Inc.
Post Office Box 231
Clinton, Iowa 52732

RE: 2005 South 19th Street
Clinton, Iowa
EPA ID# IA0047303771

Dear Mr. Bell:

We have now completed our review of Terracon's Phase I Part 2 report on the investigative and monitoring work being conducted under the 3013 Order on Consent.

In general, we agree with the interpretations and recommendations made by Terracon. Specifically, the Environmental Protection Agency (EPA) will now require the following:

1. EPA agrees that the current groundwater monitoring data does not indicate that bedrock groundwater is at risk of contamination. We also believe that the monitoring network is sufficient to allow this determination, regarding the risk of bedrock groundwater contamination, to be made. If new information were received relevant to this assessment we would reevaluate as necessary.
2. We note that the additional monitoring we required of Manufacturer's Ditch has apparently identified your NPDES discharge as the source of the elevated metals found downstream of your facility. The NPDES programs of EPA and the Iowa Department of Water, Air and Waste Management (IDWAWM) will have to determine whether these concentrations warrant any modification of the limits of the NPDES permit. We have, therefore, forwarded the EPA Water Compliance Branch a copy of the analytical data on Manufacturer's Ditch which has been generated under the 3013 Consent Order.
3. The EPA also agrees that even though no significant contamination of the bedrock groundwater has been found so far, some remedial measures are now warranted to prevent the release of additional contaminants from the lagoon area. Our letter of April 30, 1984, has required that either of the following be done in compliance with the Hazardous Waste Regulations (40 CFR 270.14 and 270.17 and 40 CFR Part 265 Subparts G and K): (1) submit a Part B Permit Application for the lagoons as a hazardous waste treatment, storage or disposal



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facility (TSDF); or (2) submit to our Permits Section plans for both closure and post-closure care of the lagoons. In view of the construction of the lagoons, their hydrogeologic setting, and current EPA policy on permitting such TSDFs we believe that the second of the two is the only realistic option for you.

On August 20, 1984, we received your closure plan and other interim status facility documents. We will be reviewing them in the near future to evaluate adequacy relative to Resource Conservation and Recovery Act (RCRA) requirements. We will be reviewing the the closure plan to determine if your submittal addresses the disposal or ultimate disposition of the wastewater in the lagoons, the sludge in the lagoons, and soils immediately underneath or adjacent to the lagoons. It will be the assumption of EPA that all of these wastes will be hazardous wastes as defined by 40 CFR 261, unless documentation is submitted that they are not hazardous wastes. Accordingly, the closure plan must provide for the disposal or management of these wastes in accordance with current federal and state regulations. Dave Crawford of our Superfund Section will be assisting the Permits Section in order to ensure that the actions proposed are consistent with both programs. Since groundwater contamination and soil contamination exist, the post-closure plan will have to be submitted to EPA by November 5, 1984. Any post-closure plan submitted would have to meet the requirements of §265.117-120 and §265.228.


4. EPA also agrees that some groundwater monitoring will be required for some additional period of time. However, at the present time EPA does not believe that a GC/MS scan is warranted on the groundwater samples. If other organic contaminants were still suspected as a cause of the Total Organic Carbon (TOC) concentrations reported in MW #5, we would have recommended a priority pollutant scan. As you know, EPA analyzed the second series of groundwater samples collected from your wells for priority pollutants. It was from these analyses that EPA was able to identify the specific organics for which we asked you to analyze the last series of groundwater samples. Thus, EPA believes that we have already determined that the TOC concentrations reported are not a result of other toxic organics, which have not yet been analyzed for. The TOC numbers may be the result of natural organic matter present in the near surface soils percolating down through surface soils into the shallow groundwater.

Nevertheless, EPA agrees that the presence of these organics bears some additional monitoring to assure that more significant concentrations do not result. We suggest that a very cost effective method for doing this monitoring would be to conduct total organic halide analyses (TOX). TOX measures for the chlorinated organics such as have been found in MW #2 and MW #5. The advantage of TOX, which is a newer analytical technique, over TOC is that TOX is not generally thought to be attributable to naturally occurring, nontoxic organics, such as TOC may be. We believe that initially both TOC and TOX should be run on groundwater samples in order that we can determine how much of the TOC would also be reported as TOX. Once this has been done we would then consider dropping back to TOX only. If TOX concentrations were to rise, more specific priority pollutant analyses would then be required.

In the last paragraph of your letter of August 17, 1984, you indicated that you intend to deal solely with Iowa Department of Water, Air and Waste Management (IDWAWM) on future matters regarding RCRA. Because you receive correspondence and requests relating to RCRA from both this Agency and IDWAWM, you may be confused on the authority and responsibilities of each agency. At this time IDWAWM does not have RCRA permit issuance/denial authority. Therefore, it is essential that you provide all information regarding RCRA permit matters and Superfund (uncontrolled site) matters to this Agency. When the authority to issue or deny permits is granted to Iowa, you will be so advised.

I would like to thank you and Terracon Consultants, Incorporated, for the degree of cooperation you have both continued to give on this project. Dave Crawford will be your contact in our Superfund Section. Dr. Dennis Degner will be your contact in the Permits Section. Please contact either if you have any questions.

Sincerely yours,


for Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division

cc: Bill Youngquist, IDWAWM
Peter Hamlin, IDWAWM
Robert Campbell, IDWAWM